

1401 Main Street, Suite 900



Phone: (803) 737-0800

[abateman@regstaff.sc.gov](mailto:abateman@regstaff.sc.gov)

*Andrew M. Bateman*  
*Counsel for ORS*

August 10, 2018

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Consolidated Docket Nos.: 2017-207-E; 2017-305-E; and 2017-370-E

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") of the deposition of Stephen Byrne.<sup>1</sup> Please see the enclosed cross-notice.

Sincerely,

Andrew M. Bateman

Encl.

cc: Joseph Melchers, Esquire (via E-mail)  
All Parties of Record in Docket No: 2017-207-E (via E-mail)  
All Parties of Record in Docket No: 2017-305-E (via E-mail)  
All Parties of Record in Docket No: 2017-370-E (via E-mail)

---

<sup>1</sup> On July 20, 2018, the Commission issued Order No. 2018-96-H, in which it granted ORS's request to depose Stephen Byrne.

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF FAIRFIELD  
COUNTY OF HAMPTON  
COUNTY OF RICHLANDIn re: V.C. Summer Nuclear Project  
Ratepayer LitigationCase No. 2017-CP-20-00300 (Goodman);  
Case No. 2017-CP-25-00335 (Lightsey);  
Case No. 2017-CP-40-04833 (Cleckley)**THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

**IN RE:** Friends of the Earth and Sierra Club, )  
Complainant/Petitioner v. South Carolina )  
Electric & Gas Company, )  
Defendant/Respondent )  
)

**IN RE:** Request of the South Carolina Office of )  
Regulatory Staff for Rate Relief to SCE&G )  
Rates Pursuant to S.C. Code Ann. § 58-27- )  
920 )  
)

**IN RE:** Joint Application and Petition of South )  
Carolina Electric & Gas Company and )  
Dominion Energy, Incorporated for Review )  
and Approval of a Proposed Business )  
Combination between SCANA Corporation )  
and Dominion Energy, Incorporated, as May )  
Be Required, and for a Prudency )  
Determination Regarding the Abandonment )  
of the V.C. Summer Units 2 & 3 Project )  
and Associated Customer Benefits and Cost )  
Recovery Plans )

**CROSS-NOTICE OF VIDEOTAPED  
DEPOSITION OF STEPHEN BYRNE**

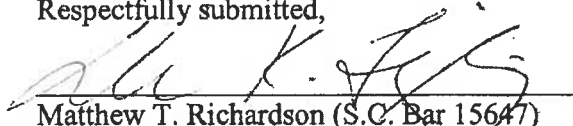
PLEASE TAKE NOTICE that, pursuant to Rule 30 of the South Carolina Rules of Civil Procedure, the South Carolina Office of Regulatory Staff ("ORS), hereby cross-notices the deposition of Stephen Byrne for purposes of the above actions and proceedings. The video deposition of Stephen Byrne will take place before a notary public, videographer, or any other officer authorized to administer oaths, on August 14, 2018 beginning at 9:00 a.m. at the offices of Richardson, Patrick, Westbrook & Brickman, 1037 Chuck Dawley Blvd., Mt. Pleasant, SC 29464 and will continue on successive days as necessary.

The deposition will be recorded by stenographic and visual means. The deposition is being taken for the purposes of discovery, for use at trial, and for such other purposes as permitted under the South Carolina Rules of Civil Procedure, Court order, and any other applicable rules.

Dated: August 8, 2018

*[Signature on following page]*

Respectfully submitted,



Matthew T. Richardson (S.C. Bar 15647)

Wallace K. Lightsey (S.C. Bar 6476)

Camden N. Massingill (S.C. Bar 101319)

**WYCHE, PA**

801 Gervais Street, Suite B

Columbia, South Carolina 29201

Phone: (803) 254-6542

Fax: (803) 254-6544

Email: mrichardson@wyche.com

Email: wlightsey@wyche.com

Email: cmassingill@wyche.com

&

Nanette Edwards

Jeffrey M. Nelson

Shannon Bowyer Hudson

Jenny R. Pittman

**OFFICE OF THE REGULATORY STAFF**

1401 Main Street, Suite 900

Columbia, South Carolina 29201

Phone: (803) 737-0889

Fax: (803) 737-0801

Email: nedwards@regstaff.sc.gov

Email: jnelson@regstaff.sc.gov

Email: shudson@regstaff.sc.gov

Email: jpittman@regstaff.sc.gov

**CERTIFICATE OF SERVICE**

I, the undersigned attorney of the firm Wyche, P.A., do hereby certify that on the 8th day of August, 2018, a true and complete copy of Defendants' Cross-Notice of Video Deposition of Stephen Byrne was served via electronic service pursuant to the Case Management Order and sending a copy by U.S. Mail and electronic mail to all counsel of record.

James Y. Becker , Esq.  
Haynsworth, Sinkler, Boyd, PA  
P. O. Box 11889  
Columbia, SC 29211-1889  
[jbecker@hsblawfirm.com](mailto:jbecker@hsblawfirm.com)

David L. Balser, Esq.  
Jonathan R. Chally, Esq. King & Spalding,  
LLP  
1180 Peachtree Street, NE  
Atlanta, Georgia 30309-3521  
[DBalser@KSLAW.com](mailto:DBalser@KSLAW.com)  
[JChally@KSLAW.com](mailto:JChally@KSLAW.com)

Robert D. Cook, Esq.  
J. Emory Smith, Jr., Esq.  
SC Attorney General 's Office  
PO Box 11549  
Columbia, SC 29211  
[bcook@scag.gov](mailto:bcook@scag.gov)

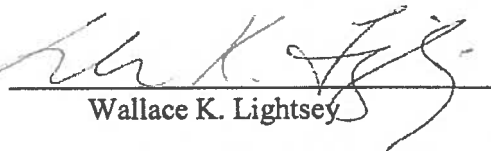
J. Preston Strom, Jr.  
Mario A. Pacella  
Bakari T. Sellers  
Jessica L. Fickling  
2110 Beltline Blvd.  
Columbia, SC 29204  
[petestrom@stromlaw.com](mailto:petestrom@stromlaw.com)  
[mpacella@stromlaw.com](mailto:mpacella@stromlaw.com)  
[bsellers@stromlaw.com](mailto:bsellers@stromlaw.com)  
[jfickling@stromlaw.com](mailto:jfickling@stromlaw.com)

RICHARDSON , PATRICK ,  
WESTBROOK & BRICKMAN, LLC  
Terry E. Richardson, Jr.  
Daniel S. Haltiwanger  
P.O. Box 1368  
Barnwell, SC 29812  
[trichardson@rpwb.com](mailto:trichardson@rpwb.com)  
[dhaltiwanger@rpwb.com](mailto:dhaltiwanger@rpwb.com)

LEWIS BABCOCK, LLP  
Keith M. Babcock  
Ariail E. King  
1513 Hampton Street  
P.O. Box 11208  
Columbia, SC 29211-1208  
[kmb@lewisbabcock.com](mailto:kmb@lewisbabcock.com)  
[aek@lewisbabcock.com](mailto:aek@lewisbabcock.com)

SPEIGHTS AND SOLOMONS  
Daniel A. Speights  
G. Solomons, III  
1100 Oak Street  
Hampton, SC 29924  
[dspeights@speightsandsolomons.com](mailto:dspeights@speightsandsolomons.com)  
[asolomons@speightsandsolomons.com](mailto:asolomons@speightsandsolomons.com)

	<p>BELL LEGAL GROUP, LLC J. Edward Bell 219 Ridge Street Georgetown, SC 29440 <a href="mailto:ebell@edbellaw.com">ebell@edbellaw.com</a></p> <p>SAVAGE, ROYALL AND SHEHEEN, LLP Vincent Sheheen 1111 Church Street Camden, SC 29020 <a href="mailto:vsheheen@thesavagefirm.com">vsheheen@thesavagefirm.com</a></p> <p>GALVIN LAW GROUP, LLC Gregory Michael Galvin P. O. Box 887 Bluffton, SC 29912 <a href="mailto:ggalvin@galvinlawgroup.com">ggalvin@galvinlawgroup.com</a></p> <p>COLEMAN &amp; TOLEN, LLC Creighton B. Coleman P. O. Box 1006 Winnsboro, SC 29180 <a href="mailto:creighton@colemantolen.com">creighton@colemantolen.com</a></p> <p><i>ATTORNEYS FOR PLAINTIFFS</i></p>
--	--

By:   
Wallace K. Lightsey